

Exhibit E

Kelly Dohm

From: Micah Hines <mhines@blackwellburke.com>
Sent: Friday, March 17, 2017 4:29 PM
To: Kelly Dohm
Cc: Genevieve Zimmerman; Michael V. Ciresi; Jan M. Conlin; bgordon@levinlaw.com; Randy Benham; Jerry Blackwell; Mary Young; Ben Hulse
Subject: Ridgeview Production - request for de-designation of documents
Attachments: RMC000032 Chris Vos email.pdf; RMC000039 - comparison of RMC infection rates.pdf; RMC000093-RMC000095.pdf; RMC000102-RMC000105.pdf; RMC000114-RMC000115.pdf; RMC000025.pdf; RMC000300.pdf; RMC000072-RMC000073.pdf; RMC000096-RMC000098.pdf; RMC000173-RMC000176.pdf; RMC000050-RMC000071.pdf; RMC000179.pdf; RMC000127-RMC000129.pdf; RMC000184-RMC000186.pdf; RMC000002-RMC000009.pdf

Hi Kelly,

I hope this email finds you well. Thank you for your client's production of documents in response to 3M's subpoena.

While we agree that Ridgeview may designate confidential information in accordance with the court's order, it does not appear that the attached documents, also listed below, qualify for the court's protection under paragraph 2. [REDACTED]

[REDACTED] We are hopeful that this can be resolved, but if we cannot reach an agreement, we will need to consider bringing the confidentiality challenge to the court.

[REDACTED]

Lastly, please let us know whether your client will agree to provide an authentication declaration for the documents you produced in lieu of a Rule 30(b)(6) deposition. If not, please let us know your client's availability for a deposition.

Please let us know your response to the above requests by Monday at 4:30 pm. If you have any questions or would like to discuss this, please do not hesitate to contact me.

Thank you,
Micah



431 South 7th Street
Suite 2500
Minneapolis, MN 55415

Micah Hines
Blackwell Burke P.A.

612.343.3284 Direct
612.343.3205 Fax

mhines@blackwellburke.com

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Kelly Dohm

From: Kelly Dohm
Sent: Monday, March 20, 2017 9:37 AM
To: 'Micah Hines'
Cc: Genevieve Zimmerman; Michael V. Ciresi; Jan M. Conlin; bgordon@levinlaw.com; Randy Benham; Jerry Blackwell; Mary Young; Ben Hulse
Subject: RE: Ridgeview Production - request for de-designation of documents

Micah, thank you for your below correspondence. I would appreciate it if you could provide clarification as to why your client believes that the documents that you have listed below should not be labeled as Confidential under the Court's order. You have not provided any explanation as to why my client should change its designation of these documents. Please provide an explanation as to the reasoning to each of them that you are requesting be re-designated. I will then sit down and go through them with my client. Assuming that you can get back to me today, I will need time to go through them with my client. I am out of the office for the majority of the day today and have evening meetings tonight. We will do our best to get responses to you as immediately as possible, but it will be very unlikely that this will occur by your arbitrary deadline indicated below.

I appreciate your anticipated professional courtesy in working through these issues.

Best regards,

Kelly C. Dohm
 Partner
 Melchert Hubert Sjodin, PLLP
 Minnesota State Bar Association
 Certified  Specialist
 Labor and Employment Law



(952) 442-7724 (Direct)

(952) 442-6166 (Fax)

kdohm@mhslaw.com

121 West Main Street; Suite 200, Waconia, MN 55387

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From: Micah Hines [mailto:mhines@blackwellburke.com]
Sent: Friday, March 17, 2017 4:29 PM
To: Kelly Dohm <kdohm@mhslaw.com>
Cc: Genevieve Zimmerman <gzimmerman@meshbesh.com>; Michael V. Ciresi <MVC@ciresiconlin.com>; Jan M. Conlin <JMC@ciresiconlin.com>; bgordon@levinlaw.com; Randy Benham <rbenham@augbiomed.com>; Jerry Blackwell <blackwell@blackwellburke.com>; Mary Young <myoung@blackwellburke.com>; Ben Hulse <BHulse@blackwellburke.com>
Subject: Ridgeview Production - request for de-designation of documents

Hi Kelly,

I hope this email finds you well. Thank you for your client's production of documents in response to 3M's subpoena.

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[REDACTED]. We are hopeful that this can be resolved, but if we cannot reach an agreement, we will need to consider bringing the confidentiality challenge to the court.

Lastly, please let us know whether your client will agree to provide an authentication declaration for the documents you produced in lieu of a Rule 30(b)(6) deposition. If not, please let us know your client's availability for a deposition.

Please let us know your response to the above requests by Monday at 4:30 pm. If you have any questions or would like to discuss this, please do not hesitate to contact me.

Thank you,
Micah



431 South 7th Street
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Minneapolis, MN 55415

Micah Hines
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Kelly Dohm

From: Micah Hines <mhines@blackwellburke.com>
Sent: Monday, March 20, 2017 11:22 AM
To: Kelly Dohm
Cc: Genevieve Zimmerman; Michael V. Ciresi; Jan M. Conlin; bgordon@levinlaw.com; Randy Benham; Jerry Blackwell; Mary Young; Ben Hulse
Subject: Re: Ridgeview Production - request for de-designation of documents

Hi Kelly,

Thank you for your response. Under the Order, it is the responsibility of the designating party to limit the designation to material that qualifies for protection, and it is the burden of the designating party to establish that the information is confidential. (see paragraphs 4, 9 and 18).

In response to your request for clarification - we reviewed the documents and they do not appear to meet the definition of confidential information set forth in paragraph 2 of the Order.

Please also let us know whether your client will agree to provide an authentication declaration for the documents you produced in lieu of a 30(b)(6) deposition or if not, your client's availability for a deposition.

Thank you.

Regards,
Micah


On Mar 20, 2017, at 10:36 AM, Kelly Dohm <kdohm@mhsllaw.com> wrote:

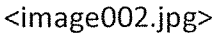
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Best regards,

Kelly C. Dohm
Partner
Melchert Hubert Sjodin, PLLP


Attorneys at Law
www.mhslaw.com



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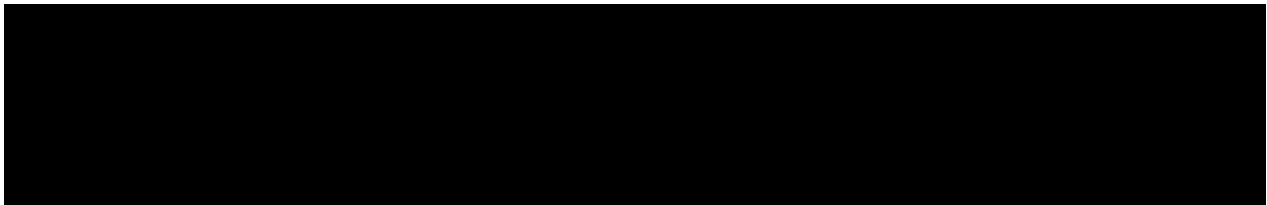
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Please let us know your response to the above requests by Monday at 4:30 pm. If you have any questions or would like to discuss this, please do not hesitate to contact me.

Thank you,

Micah

<image004.gif>

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Kelly Dohm

From: Kelly Dohm
Sent: Tuesday, March 21, 2017 5:16 PM
To: 'Micah Hines'
Subject: RE: Ridgeview Production - request for de-designation of documents

Micah, I have had a chance to connect with my client and my client wishes to continue to keep its designation of all of the documents previously marked Confidential as identified below. Ridgeview will not agree to de-designate them. There was one document that you listed below that was inadvertently not marked as Confidential that we will sending back over to you designated as Confidential which is bate stamped no. RMC 000025.

Best regards,

Kelly C. Dohm
Partner
Melchert Hubert Sjodin, PLLP
Minnesota State Bar Association
Certified A Specialist
Labor and Employment Law



(952) 442-7724 (Direct)

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Cc: Genevieve Zimmerman <gzimmerman@meshbesh.com>; Michael V. Ciresi <MVC@ciresiconlin.com>; Jan M. Conlin <JMC@ciresiconlin.com>; bgordon@levinlaw.com; Randy Benham <rbenham@augbiomed.com>; Jerry Blackwell <blackwell@blackwellburke.com>; Mary Young <myoung@blackwellburke.com>; Ben Hulse <BHulse@blackwellburke.com>
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While we agree that Ridgeview may designate confidential information in accordance with the court's order, it does not appear that the attached documents, also listed below, qualify for the court's protection under paragraph 2. [REDACTED]

[REDACTED] We are hopeful that this can be resolved, but if we cannot reach an agreement, we will need to consider bringing the confidentiality challenge to the court.

Lastly, please let us know whether your client will agree to provide an authentication declaration for the documents you produced in lieu of a Rule 30(b)(6) deposition. If not, please let us know your client's availability for a deposition.

Please let us know your response to the above requests by Monday at 4:30 pm. If you have any questions or would like to discuss this, please do not hesitate to contact me.

Thank you,
Micah



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Minneapolis, MN 55415

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Kelly Dohm

From: Micah Hines <mhines@blackwellburke.com>
Sent: Friday, April 14, 2017 2:17 PM
To: Kelly Dohm
Cc: Jan Conlin; Genevieve Zimmerman; Michael V. Ciresi; Ben Gordon; Randy Benham; Jerry Blackwell; Mary Young; Ben Hulse
Subject: Follow up on request for de-designation of documents

Kelly,

On March 17, we requested that Ridgeview de-designate documents it labeled confidential, and you responded that Ridgeview would not agree to de-designate its documents. When we spoke last Friday, April 7, we discussed whether Ridgeview would reconsider our request.

It is our understanding that Ridgeview's position is that it will not de-designate. We are prepared to file a motion to de-designate on Monday afternoon, so we'd appreciate hearing back from you by noon on Monday.

Thank you,
Micah



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Kelly Dohm

From: Kelly Dohm
Sent: Friday, April 14, 2017 4:59 PM
To: 'Micah Hines'
Subject: RE: Follow up on request for de-designation of documents
Attachments: doc05327820170414161617.pdf

Micah, I connected with my client and my client is agreeable to de-designating the attached as indicated. My client is not agreeable to designating any other documents that you requested be de-designated. We will respond to your anticipated motion accordingly.

Best regards,

Kelly C. Dohm
Partner
Melchert Hubert Sjodin, PLLP
Minnesota State Bar Association
Certified & Specialist
Labor and Employment Law



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